

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA :
vs. : 19 Cr. 373 (PGG)
MICHAEL AVENATTI, :
Defendant. :

**DECLARATION OF SCOTT A. SREBNICK, ESQ., IN SUPPORT
OF DEFENDANT AVENATTI'S MOTION FOR ISSUANCE
OF RULE 17(C) SUBPOENA DUCES TECUM TO NIKE, INC.**

I, Scott A. Srebnick, Esq., pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am a member of the law firm of Scott A. Srebnick, P.A., co-counsel for Defendant Michael Avenatti in this case.

2. I submit this Declaration in support of Mr. Avenatti's Motion for issuance of a Rule 17(c) subpoena duces tecum to the Custodian of Records of Nike, Inc.

3. Attached as Exhibit 1 to this Declaration is a proposed subpoena duces tecum to be served upon the Custodian of Records of Nike, Inc.

4. Attached as Exhibit 2 to this Declaration are various Nike text messages produced by the government in discovery (with agreed-upon redactions).

Dated: September 6, 2019

/s/Scott A. Srebnick
Scott A. Srebnick

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Scott A. Srebnick
Scott A. Srebnick

EXHIBIT 1

UNITED STATES DISTRICT COURT
for the
Southern District of New York

United States of America)	
v.)	
Michael Avenatti)	Case No. 19 cr 373 (PGG)
<u>Defendant</u>)	

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASE**

To: Custodian of Records, Nike Inc.
One Bowerman Drive, Beaverton, OR 97005-6453

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:

See Attachment

Place: Scott A. Srebnick, P.A.
201 S. Biscayne Blvd., #1210
Miami, FL 33131

Date and Time: 10/15/2019 12:00 pm

Certain provisions of Fed. R. Crim. P. 17 are attached, including Rule 17(c)(2), relating to your ability to file a motion to quash or modify the subpoena; Rule 17(d) and (e), which govern service of subpoenas; and Rule 17(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

(SEAL)

Date: _____

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing *(name of party)* _____ Michael Avenatti _____, who requests this subpoena, are:

Scott A. Srebnick, P.A., 201 South Biscayne Blvd., #1210, Miami, FL 33131 (305) 285-9019
scott@srebnicklaw.com

Notice to those who use this form to request a subpoena

Before requesting and serving a subpoena pursuant to Fed. R. Crim. P. 17(c), the party seeking the subpoena is advised to consult the rules of practice of the court in which the criminal proceeding is pending to determine whether any local rules or orders establish requirements in connection with the issuance of such a subpoena. If no local rules or orders govern practice under Rule 17(c), counsel should ask the assigned judge whether the court regulates practice under Rule 17(c) to 1) require prior judicial approval for the issuance of the subpoena, either on notice or ex parte; 2) specify where the documents must be returned (e.g., to the court clerk, the chambers of the assigned judge, or counsel's office); and 3) require that counsel who receives produced documents provide them to opposing counsel absent a disclosure obligation under Fed. R. Crim. P. 16.

Please note that Rule 17(c) (attached) provides that a subpoena for the production of certain information about a victim may not be issued unless first approved by separate court order.

AO 89B (07/16) Subpoena to Produce Documents, Information, or Objects in a Criminal Case (Page 2)

Case No. 19 cr 373 (PGG)

PROOF OF SERVICE

This subpoena for (*name of individual and title, if any*) _____
was received by me on (*date*) _____.

I served the subpoena by delivering a copy to the named person as follows:

_____ on (*date*) _____; or

I returned the subpoena unexecuted because:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Criminal Procedure 17 (c), (d), (e), and (g) (Effective 12/1/08)

(c) Producing Documents and Objects.

(1) In General. A subpoena may order the witness to produce any books, papers, documents, data, or other objects the subpoena designates. The court may direct the witness to produce the designated items in court before trial or before they are to be offered in evidence. When the items arrive, the court may permit the parties and their attorneys to inspect all or part of them.

(2) Quashing or Modifying the Subpoena. On motion made promptly, the court may quash or modify the subpoena if compliance would be unreasonable or oppressive.

(3) Subpoena for Personal or Confidential Information About a Victim. After a complaint, indictment, or information is filed, a subpoena requiring the production of personal or confidential information about a victim may be served on a third party only by court order. Before entering the order and unless there are exceptional circumstances, the court must require giving notice to the victim so that the victim can move to quash or modify the subpoena or otherwise object.

(d) Service. A marshal, a deputy marshal, or any nonparty who is at least 18 years old may serve a subpoena. The server must deliver a copy of the subpoena to the witness and must tender to the witness one day's witness-attendance fee and the legal mileage allowance. The server need not tender the attendance fee or mileage allowance when the United States, a federal officer, or a federal agency has requested the subpoena.

(e) Place of Service.

(1) In the United States. A subpoena requiring a witness to attend a hearing or trial may be served at any place within the United States.

(2) In a Foreign Country. If the witness is in a foreign country, 28 U.S.C. § 1783 governs the subpoena's service.

(g) Contempt. The court (other than a magistrate judge) may hold in contempt a witness who, without adequate excuse, disobeys a subpoena issued by a federal court in that district. A magistrate judge may hold in contempt a witness who, without adequate excuse, disobeys a subpoena issued by that magistrate judge as provided in 28 U.S.C. § 636(e).

ATTACHMENT

1. All text messages and e-mails to or from Nike employees Carlton DeBose and/or Jamal James discussing or referencing payments for the benefit of California Supreme players DeAndre Ayton, Brandon McCoy, and/or Bol Bol, in 2016-17;
2. All text messages and emails to or from Nike employees Carlton DeBose, Jamal James, John Stovall, Nico Harrison, and/or Rachel Baker discussing or referencing the payment to amateur basketball players and/or their families or agents, between January 1, 2016, and March 25, 2019;
3. All false invoices that Nike employees Carlton DeBose and/or Jamal James directed or participated in (whether directly or indirectly) to hide payments (whether cash or otherwise) to amateur basketball players and/or their families or agents (including handlers), between January 1, 2016, and March 25, 2019;
4. The federal grand jury subpoena(s) served upon Nike by the USAO-SDNY and all certificates of authentication/production indicating when Nike, Inc., produced the documents in ##1-3, if at all, to the government.

EXHIBIT 2

(John Stovall)

To: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:28:25 PM	Freedman will cover the 10 grand. I agree once the deal is done the well is dry. I think they will agree to that. The [REDACTED] deal is the [REDACTED] kid. He will stay with the [REDACTED]
To: [REDACTED] Carlton Debose From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:29:31 PM	Freedman had originally told me that he thinks [REDACTED] feel like this takes away from them if the kid who normally would go home and play for [REDACTED] stays and play with them. Is he staying with [REDACTED] how Sto?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 9:29:33 PM	What does it have to do with Freedman though?
To: [REDACTED] Jamal James From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 9:31:03 PM	But it will get to the end of being done (trust me on this one) and Mel will come back to you all and say, we're close but I need XYZ.
To: [REDACTED] Jamal James To: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:33:47 PM	[REDACTED] handler had him with the [REDACTED] last year. [REDACTED] goes to school in Cali. I think freedman would return him to the [REDACTED]. They may have too many gigs without it and [REDACTED] may not play.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:37:37 PM	Gary first check = \$36K
To: [REDACTED] Carlton Debose			
From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 9:39:39 PM	30 goes to that team. Period. And he can't bullshit and say that it was going to go to the other teams. It's bullshit bc that 17u has 4 stops of flights and hotels before their next check.
To: [REDACTED] Jamal James From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:40:47 PM	Ok. 3 stops this year though right?
To: [REDACTED] Carlton Debose From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:41:10 PM	He won't even have to spend anything for Cali
To: [REDACTED] Carlton Debose From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:41:30 PM	Kids should be able to be on their own session 4 right?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 9:43:33 PM	Oh shit. You're right. Duh. Wasn't thinking. Yes he can afford that 30k
To: [REDACTED] Jamal James To: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:51:23 PM	IMO we get the check from Gary and give it to Mel/Freedman. I don't want any Bs from anyone.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:52:10 PM	I'll take it a step further can we redirect the payment to Freedman?
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:52:18 PM	From AP?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 9:53:43 PM	No. Would have to be set up as a vendor. G knows how this is supposed to go. Let Freedman know that the check is coming to G. Give him X amount of days for the check to clear in his account. Jamal to G, write him a check for 30K
To: [REDACTED] Jamal James From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:54:18 PM	Ok
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/12/2017	2/12/2017 9:55:27 PM	CD how does this impact Mike Law (if at all), just curious?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 10:11:15 PM	Need you two to meet with him while you're in LA. Meet with just you two and Mike. Tell him that I told you two to meet with him. After that everything will be fine. He hates Mel but he's a soldier and will do what we need him to do
To: [REDACTED] Jamal James From: [REDACTED] Jamal James	2/12/2017	2/12/2017 10:11:54 PM	Ok, can you prime him?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/12/2017	2/12/2017 10:42:16 PM	Yes. What day are you planning to visit with him?
To: [REDACTED] Jamal James			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 12:31:45 AM	Wednesday or Thursday
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 12:32:00 AM	Also can we get AP to give Gary his whole payment?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 12:58:16 AM	Why would Gary need his whole payment
To: [REDACTED] Jamal James From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:07:48 AM	Just listened to it. Typical Gary smh. I gave Gary the layout plain and simple. I even told him that we've discussed this internally (because you know the "I need to talk to Carlton about this" statement came up). I told him we're looking at this from an overall brand perspective and that we basically need to make this happen.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:10:31 AM	I gave him the layout and even told him in good faith I'd exercise his option. At this point I'm ready to remove the perception of this being a choice for him. Agree or no?
To: [REDACTED] Carlton Debose From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 1:12:31 AM	You've been nicer than I would have been. Also break the news to him that EVERYONE was gone until you moved in and saved him from himself.
To: [REDACTED] Jamal James			

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(John Stovall)

From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:22:05 AM	CD can you do me a favor and simply text him "Jamal gave you the layout right?"
To: [REDACTED] Carlton Debose			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 1:25:02 AM	Will do it now.
To: [REDACTED] Jamal James			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 1:39:00 AM	G, I'm cooking dinner for my family and then have some work to do for some meetings tomorrow. Jamal gave you the same layout that he gave me on Fri. I caught and understood it all. Meet with him and ask all the questions that you need and then we can all follow up afterwards
To: [REDACTED] Jamal James			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 1:39:29 AM	Does that work?
To: [REDACTED] Jamal James			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:55:52 AM	I'm out at dinner. Will listen on the way home.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:57:10 AM	Fwd: Are you guys doing 30k spring/ and summer? Just wanted the Rivers deal matched. He was doing 30k for spring and said if we show up at the 2 events and Etops Memorial Day then he will repeat the deal for the summer. So yes he would do 60k but contract was limited to spring because he wanted to make sure we were going to go.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 1:57:27 AM	Freedman just sent me that! ☺☺
To: [REDACTED] Carlton Debose			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 2:04:50 AM	Like I said to you guys earlier. If he wants to acknowledge when he talked to you the other day that NIKE is better than adidas then obviously we shouldn't be paying the same amount. Now if you look at Gary's money and let him know how much he has to give them out of the money then by all means have at it.
To: [REDACTED] Jamal James			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 2:12:27 AM	But I'm just telling everyone from jump street that I'm not giving any where close to 60k out of my budget to get them with Gary. To where I would be giving G his contract money and letting him rock with that and then give them money as well?! Nope. No chance. It will be minimal what I give them outside of G's deal.
To: [REDACTED] Jamal James			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 2:16:16 AM	With you 100%
To: [REDACTED] Carlton Debose			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 2:16:38 AM	OK deal
To: [REDACTED] Jamal James			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 3:50:35 AM	Fwd: I apologize in advance for this long text. Just want to fully explain my mental and financial process--- In response, I sent a text previously saying the Adidas 30k was for spring travel. That was for 2 trips plus regional event in LA. Nike has 3 out of state events in spring. Adidas has 2 out of state events in spring. It's 30k for 4 trips with Nike. Adidas was 30k for 2 trips. I am not looking for a better deal from you just to match the existing one in terms of travel given the number of events. I am going out of pocket to pay Rivers back and to keep Mel sane. That will personally cost me 25-30k. I figure 5-10k for Rivers and 20k total for Mel. I am budgeting 20k per trip with the entourage of hangers on and parent needs. Adidas I am out another 10k total for the 2 trips at 20k each. 40k-30k= 10k. With the Nike deal I will be out 50k for 4 trips. 80k-30k=50k. So the total out of pocket will be the 50k plus 25-30 on the Rivers/Mel piece. That's 75-80k out of pocket total with the Nike deal vs 30k out of pocket with the Adidas deal (no payback). I am totally fine with putting my own money in. I just want to limit it to 50k at most. Again, I am not asking for you to beat or even match the Adidas deal. I am just asking for a closer match in the equivalent travel. I really think my commitment to put in an additional 50k shows some good faith. (Did not add in paying coaches which I will handle also). Finally, if I do not spend it all plus my 50k, I will return the remaining sum. Not looking to profit at all just to keep my exposure at 50k.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 3:50:46 AM	From Freedman...thoughts?
To: [REDACTED] Carlton Debose			
To: [REDACTED] Jamal James	2/13/2017	2/13/2017 4:03:51 AM	Sorry, I've been on a plane for 4 hours. I'd leave it at 30k. Maybe go up to 35 if you want to be nice. (Up to Carlton). 60k or whatever just came up. The deal before we started this was no money when I was in LA last weekend!!
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 4:07:57 AM	Exactly! Exactly!!.. I'm ready to walk. Long term play is if Gary's bad then we're free to walk from him after this summer. [REDACTED] is up too! That's \$72K and \$60K respectively! That frees us to have some real leverage to do something's [REDACTED] is up after this year right?
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 4:08:16 AM	About to give my lil man a bath. Sto I'll forward you email I sent to Gary
To: [REDACTED] Carlton Debose			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 4:58:01 AM	All of those numbers mean nothing to me. He can list candy, nuts and chicken butts as part of his cost for all I care. That means nothing to me. Nothing. The question should be: how much of Gary's deal is he asking for? Also paying back adidas (which they won't and can't accept) has nothing to do with me. And while I'm at it, the only thing he's "reimbursing" adidas for is uniforms. Plain and simple question that needs to be answered: how much of Gary's deal is he asking for?
To: [REDACTED] Jamal James			
From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 5:00:06 AM	Also you need it in writing what adidas is going to give them BC THEY WERENT GOING TO GIVE THEM 60K AND GIVE LANGFORD AND WILLIAMSON AROUND 50K OR 60K. NOPE NO CHANCE GENTLEMEN.
To: [REDACTED] Jamal James			
To: [REDACTED] Jamal James	2/13/2017	2/13/2017 5:10:09 AM	Agreed. To me it's all about what we are willing to do. No question they want to be over here and we want them. Everyone must sacrifice to make this work. We have offered our part. It's their turn.
To: [REDACTED] Carlton Debose			
From: [REDACTED] Jamal James	2/13/2017	2/13/2017 5:11:28 AM	I'm asking him to send the Adidas offer. Sto, who gave you the particulars of the deal first? Mel or Freedman?
To: [REDACTED] Carlton Debose			
To: [REDACTED] Jamal James	2/13/2017	2/13/2017 5:15:02 AM	Freedman then Mel 15 minutes later
To: [REDACTED] Carlton Debose			

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(John Stovall)

From: [REDACTED] Jamal James	2/13/2017	2/13/2017 5:15:33 AM	They both said no money?!?	
To: [REDACTED] Carlton Debose	[REDACTED] Jamal James	2/13/2017	2/13/2017 5:15:35 AM	I will be in the air for the next 2 hours.
To: [REDACTED] Carlton Debose	[REDACTED] Jamal James	2/13/2017	2/13/2017 5:17:50 AM	The adidas deal or what they wanted from us?
To: [REDACTED] Carlton Debose	[REDACTED] Jamal James	2/13/2017	2/13/2017 5:19:06 AM	They assumed we were covering travel. A dollar figure was never mentioned. That conversation originally came from Mel.
To: [REDACTED] Carlton Debose	From: [REDACTED] Carlton Debose	2/13/2017	2/13/2017 5:21:00 AM	And you need to tell them that they've put you in a position where you both had to bring me up to 4 different scenarios now and it's making you both look crazy and making this deal more unlikely by the minute. If need be walk them through all of the different things that's been said. You need to let Freedman know not to let Mel walk him into no deal here. I told you both this am that it was going to get murkier bc Mel is a lying piece of shit.
To: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:23:35 AM	No doubt. That's why we are mostly dealing with freedman.
To: [REDACTED] Carlton Debose				
From: [REDACTED] Carlton Debose		2/13/2017	2/13/2017 5:25:10 AM	But he's listening to and being guided by Mel. Don't forget that. I tell you what though...I'm willing to bet that the respect of what I did last year with Mel, Gary Franklin, Hillcrest, DeAndre Ayton and Larnelle just shot through the roof for you guys over the past week or so. So that's a selfish silver lining for me.
To: [REDACTED] Jamal James				
To: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:26:00 AM	Believe me. We are not!!
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:26:00 AM	Big time!!!!
To: [REDACTED] Carlton Debose				
From: [REDACTED] Carlton Debose		2/13/2017	2/13/2017 5:31:44 AM	This mfer Mel has got Freedman petrified and when you both get to Cali you need to strengthen and embolden these other people that's following this clown's every word and put an end to this shit
To: [REDACTED] Jamal James				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:48:39 AM	I agree!!
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:48:48 AM	Look at this sh*t....
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:48:55 AM	Fwd: As an attorney, sending a competitor a copy of the competitors contract would not be smart because provides Adidas with potential claims of interference with contract. It would also be disrespectful. If the issue is whether the money is limited to the spring, I can share a part of the email sent with it.
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:49:41 AM	How much don we care about Bol Bol?
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/13/2017	2/13/2017 5:49:47 AM	*do
To: [REDACTED] Carlton Debose				
From: [REDACTED] Carlton Debose		2/13/2017	2/13/2017 5:58:54 AM	This is all about harming [REDACTED] and strengthening [REDACTED]. Couldn't care less about Bol Bol honestly. said this the other day when we talked. I was like "oh well" about their deal with [REDACTED] but when presented to weaken them I jumped at the chance. You need to tell Freedman that he has unnecessarily confused this situation and it needs to be cleaned up if he wants to get it done bc he's given you numerous confusing scenarios to a situation that was running smooth 24 hrs ago
To: [REDACTED] Jamal James				
From: [REDACTED] Jamal James		2/14/2017	2/14/2017 12:06:43 AM	Going to pick up my young guy. I just called Freedman. Didn't get an answer but left another message telling him we need the bottom line (\$). Told him our initial understanding was a flat \$30k so the new scenarios have thrown us for a loop somewhat. Told him We need a bottom line and at this point we're removing the choice from Gary.
To: [REDACTED] Carlton Debose				
To: [REDACTED] Jamal James		2/14/2017	2/14/2017 12:07:36 AM	U plan on mtg with them this week? He said he was open and would make time
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/14/2017	2/14/2017 12:14:08 AM	That was my plan! Mel said he (Freedman) didn't have time when I tried to set something up last week for us on to meet Wednesday. ☺ Freedman told me he had to sign the deal by today when we were talking over the weekend.
To: [REDACTED] Carlton Debose				
To: [REDACTED] Jamal James		2/14/2017	2/14/2017 10:37:33 PM	Sorry to bother u today. But 1 quick question. Have u talked to Gary about giving up the 30 and did he agree? I moved this to our group chat because C would need to know to.
To: [REDACTED] Carlton Debose				
To: [REDACTED] Jamal James		2/14/2017	2/14/2017 10:37:36 PM	Too
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/14/2017	2/14/2017 10:38:23 PM	He hasn't responded to me email or calls. At this point we may just tell him that's what we're doing? Have you talked to Freedman?
To: [REDACTED] Carlton Debose				
To: [REDACTED] Jamal James		2/14/2017	2/14/2017 10:41:44 PM	Yep.
To: [REDACTED] Carlton Debose				

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(John Stovall)

To: [REDACTED] Jamal James	2/19/2017	2/19/2017 12:48:28 AM	As you know [REDACTED] turned down our deal. Adidas asked them not to sign our deal and has talked to them about an "unlimited" product deal. They have not signed anything yet.	
To: [REDACTED] Carlton Debose	2/19/2017	2/19/2017 9:27:46 PM	Any update on Freedman and Mark? Freedman hit me this afternoon asking.	
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/19/2017	2/19/2017 9:59:19 PM	Fwd: Would not work. Mark has a good team and 9 guys at least. He promised them. We have 7 guys. Need our own situation. Adidas came up to 75k. They are making announcements and individual deals. I thought you would consider giving Mark Gary's spot since he has nothing and choose to hurt the brand out of ego. I did not care about spending more than I would on Adidas. Really tried my best here. We would do another team but cannot do Cal Supreme given the partner cares less about the kids and the brand.
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/19/2017	2/19/2017 10:04:20 PM	Should we move Gary out? ☐
To: [REDACTED] Carlton Debose	From: [REDACTED] Carlton Debose	2/19/2017	2/19/2017 10:15:43 PM	In fairness that was exactly what was done. Point blank period. Crazily and this should piss both of you off is that all of your work was blown up by having Gary have a coach (a coach that was going to be ignored by the way, don't get it twisted) on the bench. Good ended up being the enemy of perfect which should never happen in negotiations
To: [REDACTED] Jamal James	From: [REDACTED] Carlton Debose	2/19/2017	2/19/2017 10:25:34 PM	To further make my point. Gary and Mike and whoever inside the program can monitor what's going on with the program by sitting directly behind the bench or next to it and be just as effective. We don't have the EYBL at the Staples Center where Gary and his people would need security clearance and All Access passes. This becomes more asinine the more I think about it. Also want to be frank with you both and say for the record that all of these mfer G/Freedman/Mel can all go fly a fucking kite. I just know how hard the both of you have worked on this
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/19/2017	2/19/2017 10:51:52 PM	Just got off the phone with Mark.. he said he's talked to Gary and Bryan and thinks he can get it done I told him to get it done. He said to give him a couple of hours so we'll see.
To: [REDACTED] Jamal James	To: [REDACTED] Carlton Debose	2/19/2017	2/19/2017 10:52:19 PM	Amen. Not sure how we would move Gary out at this point. We may just have to let him crash and burn unless there is an alternative I am not aware of.
To: [REDACTED] Carlton Debose	From: [REDACTED] Carlton Debose	2/19/2017	2/19/2017 10:53:05 PM	OK let me know
To: [REDACTED] Jamal James	To: [REDACTED] Jamal James	2/19/2017	2/19/2017 10:54:31 PM	Given what Mal just said I hope I did all that typing for nothing. Good luck to Mark!
To: [REDACTED] Carlton Debose	To: [REDACTED] Jamal James	2/25/2017	2/25/2017 3:56:35 AM	I hate to revisit this crap. BUT....imo. We should give Gary an ultimatum. Do what we are asking or lose your EYBL spot to [REDACTED]
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/25/2017	2/25/2017 4:31:40 AM	At this point I'm letting him cook. He's done after this year...focus on finding a replacement or [REDACTED]
To: [REDACTED] Carlton Debose	To: [REDACTED] Jamal James	2/25/2017	2/25/2017 4:49:55 AM	Ok
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/25/2017	2/25/2017 5:08:58 AM	CD...what you think? Move him out?
To: [REDACTED] Carlton Debose	From: [REDACTED] Carlton Debose	2/25/2017	2/25/2017 7:03:04 PM	Fellas I just got my phone back (left it at the gym last night). What's the latest with this Freedman/Mel situation?
To: [REDACTED] Jamal James				
To: [REDACTED] Jamal James		2/25/2017	2/25/2017 7:09:44 PM	I was with Mel and Freedman last night. They still want to do it and "say" they have not signed anything. I TOTALLY understand Jamal's point and I'm fine with that too.
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/25/2017	2/25/2017 7:09:53 PM	I haven't talked to Freedman or Mel since last week. You saw the email Gary sent us right? Also, I told Sto this, but this dude had the audacity to say to me on the phone the other day that I should still exercise his option because he did at least try to make it work (ಠ_ಠ). Let him cook...do everything by the boom with him, nothing extra, no favors, and on September 30th we can retire his Jersey.
From: [REDACTED] Jamal James		2/25/2017	2/25/2017 7:10:25 PM	*by the book
To: [REDACTED] Carlton Debose	To: [REDACTED] Jamal James	2/25/2017	2/25/2017 7:12:19 PM	I don't think I got the email but I have no argument with that. I don't think [REDACTED] goes over there without our ok.
To: [REDACTED] Carlton Debose	From: [REDACTED] Jamal James	2/25/2017	2/25/2017 7:12:59 PM	I agree to the [REDACTED] piece. Talked to [REDACTED] yesterday
To: [REDACTED] Carlton Debose				
From: [REDACTED] Jamal James		2/25/2017	2/25/2017 7:14:02 PM	Sto he sent an email asking about his payment and then put the Freedman piece in it. I'll send it to you (for entertainment purposes)
To: [REDACTED] Carlton Debose				
From: [REDACTED] Carlton Debose		2/25/2017	2/25/2017 7:18:25 PM	Here's what I think: with a deadline of Sun afternoon and team announcement on Mon. Get Gary's roster of who he will have and we will take it from there.
To: [REDACTED] Jamal James				
From: [REDACTED] Carlton Debose		2/25/2017	2/25/2017 7:19:12 PM	I just want to see what he puts forward and I will decide from there
To: [REDACTED] Jamal James				

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(Jamal James)

From: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:26:25 PM	I am not committing to anything financially until I know what and where everything sits. Is there a commitment? What are the costs? Bc someone like Mel will keep coming to the well if commitments are continually made. I don't give a shit about the 10k if I'm already spending approximately 100k but it can not keep ballooning to higher numbers. I don't understand the lightning part.
To: [REDACTED] John Stovall			
From: [REDACTED] John Stovall	2/12/2017	2/12/2017 9:28:26 PM	Freedman will cover the 10 grand. I agree once the deal is done the well is dry. I think they will agree to that. The [REDACTED] deal is the [REDACTED] kid. He will stay with the [REDACTED].
To: [REDACTED] Carlton DeBose			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:29:30 PM	Freedman had originally told me that he thinks [REDACTED] feel like this takes away from them if the kid who normally would go home and play for [REDACTED] stays and play with them. Is he staying with [REDACTED] now Sto?
To: [REDACTED] John Stovall			
From: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:29:33 PM	What does it have to do with Freedman though?
To: [REDACTED] John Stovall			
From: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:31:03 PM	But it will get to the end of being done (trust me on this one) and Mel will come back to you all and say, we're close but I need XYZ.
To: [REDACTED] John Stovall			
From: [REDACTED] John Stovall	2/12/2017	2/12/2017 9:33:48 PM	[REDACTED] handler had him with the [REDACTED] last year. [REDACTED] goes to school in Cali. I think freedman would return him to the lightning. They may have too many bigs without it and [REDACTED] may not play.
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:37:35 PM	Gary first check = \$36K
To: [REDACTED] John Stovall			
From: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:39:39 PM	30 goes to that team. Period. And he can't bullshit and say that it was going to go to the other teams. It's bullshit bc that 17u has 4 stops of flights and hotels before their next check.
To: [REDACTED] John Stovall			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:40:46 PM	Ok. 3 stops this year though right?
To: [REDACTED] John Stovall			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:41:08 PM	He won't even have to spend anything for Cali
To: [REDACTED] John Stovall			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:41:29 PM	Kids should be able to be on their own session 4 right?
To: [REDACTED] John Stovall			
From: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:43:33 PM	Oh shit. You're right. Duh. Wasn't thinking. Yes he can afford that 30k
To: [REDACTED] John Stovall			
From: [REDACTED] John Stovall	2/12/2017	2/12/2017 9:51:25 PM	IMO we get the check from Gary and give it to Mel/Freedman. I don't want any Bs from anyone.
To: [REDACTED] Carlton DeBose			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:52:09 PM	I'll take it a step further can we redirect the payment to Freedman?
To: [REDACTED] John Stovall			
To: [REDACTED] Carlton DeBose	2/12/2017	2/12/2017 9:52:16 PM	From AP?
To: [REDACTED] John Stovall			

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